



Matthew W. Gissendanner  
Assistant General Counsel

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November 3, 2017

**VIA ELECTRONIC FILING**

Mr. Randall Dong, Esquire  
**Public Service Commission of South Carolina**  
101 Executive Center Drive  
Columbia, South Carolina 29210

RE: Clinton Dixon v. South Carolina Electric & Gas Company  
Reply to Mr. Dixon's Response to Motion to Dismiss of South Carolina  
Electric & Gas Company  
Docket No. 2017-331-E

Dear Mr. Dong:

By way of this letter, South Carolina Electric & Gas Company ("SCE&G" or "Company") hereby replies to the Response of Mr. Clinton Dixon, dated November 1, 2017, to SCE&G's Motion to Dismiss in the above-referenced matter.

In its Motion to Dismiss, the Company requested that the Commission dismiss Mr. Dixon's Complaint on the grounds that it (1) does not meet the Commission's requirements for pleadings and (2) fails to state facts sufficient to constitute a basis for relief under applicable law.

In his Response, Mr. Dixon asks the Commission not to grant SCE&G's motion. Mr. Dixon asserts that he lives in a two bedroom apartment, that he does not have a washer or dryer, that he has a dish washer but never uses it, that his temperature settings are 78 degrees in both the summer and the winter, that most of the time he is not home and leaves nothing on, and that SCE&G has gotten \$3,228 from him.

SCE&G admits that Mr. Dixon lives in an apartment, but is without sufficient information to form a belief as to the truth of whether Mr. Dixon's apartment has two bedrooms, as to whether Mr. Dixon has a washer or dryer, as to whether Mr. Dixon never uses his dish washer, as to whether his temperature settings are 78 degrees in both summer and the winter, and as to whether most of the time he is not at home and leaves nothing on. However, SCE&G avers that it advises its customers to set

(Continued . . .)

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their thermostat on 68 degrees in the winter months and specifically advised Mr. Dixon of this recommendation by letter dated March 6, 2017. See attached Exhibit A. Nevertheless, Mr. Dixon admits that he sets his thermostat at 78 degrees in the winter. With respect to Mr. Dixon's allegation that SCE&G has gotten \$3,228 from him, SCE&G avers that, as of October 27, 2017, SCE&G has received a total of \$3,241.21 in payments on Mr. Dixon's account. Of that total, \$1,325.00 was paid by the Wateree Community Action Agency, and \$1,916.21 was paid by Mr. Dixon. On August 8, 2016, SCE&G refunded Mr. Dixon \$256.58; therefore the total out-of-pocket amount for Mr. Dixon himself is \$1,659.63. As of November 3, 2017, Mr. Dixon still owes the Company \$249.13.

Despite the facts alleged by Mr. Dixon in his Response, Mr. Dixon still has not set forth a "concise and cogent statement of the factual situation surrounding the complaint" and has not alleged any wrongdoing by SCE&G. There is no allegation that his meter is reading improperly; indeed, Mr. Dixon did not check the box for "[m]eter [i]ssue" on the complaint form. And, despite checking the box for "[b]illing [e]rror/[a]djustments," Mr. Dixon makes no specific allegation as to what billing error he is alleging so as to allow SCE&G to answer the complaint or file direct testimony addressing the allegations. SCE&G avers that Mr. Dixon's bill is being calculated correctly based on his metered usage and attaches his most recent bill as Exhibit B hereto with confidential customer account information. Mr. Dixon filed a similar complaint against the Company in June 2016 which the Commission dismissed by Order No. 2016-477, finding that Mr. Dixon "cite[d] no violation of any laws or regulation by the Company." The same is true here. As such, Mr. Dixon's complaint should be dismissed for the reasons stated in the Company's Motion to Dismiss.

Based upon the foregoing, SCE&G respectfully requests that Mr. Dixon's Complaint be dismissed and that, while the Commission is considering the Company's request, the Commission toll the hearing date and the deadlines for filing testimony for all parties in this docket.

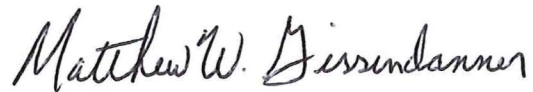
By copy of this letter, we are serving this reply and the affidavit of Carolyn B. Frick upon Mr. Dixon as well as counsel for the ORS and enclose a certificate of service to that effect.

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November 3, 2017  
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If you have any questions or concerns, please do not hesitate to contact us.

Very truly yours,



Matthew W. Gissendanner

MWG/kms  
Enclosure

cc: Clinton Dixon  
(via U.S. First Class Mail w/ enclosure)  
Dawn Hipp  
Andrew Bateman, Esquire  
(both via electronic mail and U.S. First Class Mail w/ enclosure)

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**  
**DOCKET NO. 2017-331-E**

**IN RE:**

Clinton Dixon,

Complainant/Petitioner,

v.

South Carolina Electric & Gas Company,

Defendant/Respondent.

**AFFIDAVIT**

Personally appeared before me Carolyn B. Frick who, having first been duly sworn, deposes and states as follows:


1. My name is Carolyn B. Frick and I am a Lead Analyst for South Carolina Electric & Gas Company ("SCE&G" or "Company"). Among other things, I am responsible for the investigation of customer complaints received through the South Carolina Office of Regulatory Staff as well as customer complaints filed with the Public Service Commission of South Carolina ("Commission") requesting a hearing before the Commission. I am competent to make this affidavit.

2. This affidavit is based upon my personal knowledge and review of documents received and maintained in the ordinary course of business by SCE&G. I am familiar with the records of SCE&G that pertain to Mr. Clinton Dixon and have personally worked on the documents and records concerning Mr. Dixon.

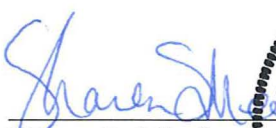

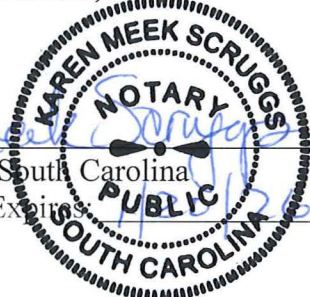


3. I assisted SCE&G's attorney in preparing the Company's Reply dated November 3, 2017, which was filed in reply to the Response of Mr. Dixon dated November 1, 2017, and received by the Commission on or about November 2, 2017. I have read the Company's Reply and verify that the information contained therein is true and accurate to best of my knowledge, information and belief.

FURTHER AFFIANT SAYETH NOT.

  
\_\_\_\_\_  
Carolyn B. Frick

Sworn to and subscribed before me  
this 3rd day of November, 2017

  
\_\_\_\_\_  
Notary Public for South Carolina  
My Commission Expires   


**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**  
**DOCKET NO. 2017-331-E**

IN RE:

Clinton Dixon vs. South Carolina  
Electric & Gas Company

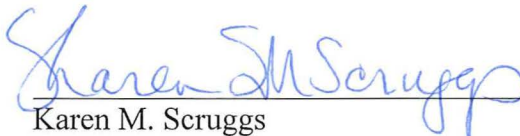
**CERTIFICATE  
OF SERVICE**

This is the certify that I have caused to be served this day one (1) copy of South Carolina Electric & Gas Company's **Reply** to the persons named below at the addresses set forth and in the manner described:

Clinton Dixon  
525 Alcott Drive, Apartment 9F  
Columbia, SC 29203  
(via U.S. First Class Mail)

Andrew M. Bateman, Esquire  
Office of Regulatory Staff  
1401 Main Street, Suite 900  
Columbia, SC 29201  
[abateman@regstaff.sc.gov](mailto:abateman@regstaff.sc.gov)  
(via electronic mail and U.S. First Class Mail)

Dawn Hipp  
Office of Regulatory Staff  
1401 Main Street, Suite 900  
Columbia, SC 29201  
[dhipp@regstaff.sc.gov](mailto:dhipp@regstaff.sc.gov)  
(via electronic mail and U.S. First Class Mail)

  
Karen M. Scruggs

Cayce, South Carolina

This 3rd day of November 2017



March 06, 2017

CLINTON DIXON  
525 ALCOTT DR APT 9F  
COLUMBIA SC 29203-4424

Re: Service Address: 525 ALCOTT DR APT 9F

CLINTON DIXON:

In response to your recent inquiry, a representative has verified the reading on your meter. The following information shows the previous billed reading that you inquired about, and the new reading.

<u>Previous Billed Reading</u>		<u>New Reading</u>	
Date Read:	2/22/2017	Date Read:	3/2/2017
Electric Reading:	87637	Electric Reading:	87865

Corrected bills are generated on accounts when the reading is incorrect. This new reading indicates that your current bill is correct.

For more information on saving energy, please visit our website at [www.sceg.com](http://www.sceg.com). We encourage you to utilize the Energy Analyzer Tool which allows you to compare your bills month-to-month, year-to-year for the last 24 months. This tool also gives insight into how temperatures may impact your usage. Click on "Save Energy & Money" link to access the 24 month bill analyzer.

For your convenience, here are a few energy savings ideas:

- Set your thermostat at 68 degrees in winter months and 78 degrees in summer months.
- Replacing standard incandescent light bulbs with compact fluorescent bulbs (CFL's) can reduce your lighting costs by up to 75%.
- Check your air filters once a month and replace them if dirty. Your heating/cooling system won't have to work as hard.
- Caulk, seal and weather-strip around all seams, cracks and openings, especially around windows and exterior doors.

If you have any questions or need additional assistance, please call us at 1-800-251-7234. Our Customer Service Representatives are available to help you.

Sincerely,  
SCE&G Customer Service



SERVICE FOR  
CLINTON DIXON  
525 ALCOTT DR APT 9F  
COLUMBIA SC 29203-4424

EXHIBIT B Page 1 of 3

ACCOUNT NUMBER

Page 1 of 3

TOTAL AMOUNT DUE  
\$249.13

www.sceg.com

## CUSTOMER SERVICE - 24 HOURS A DAY

1-800-251-7234, toll-free

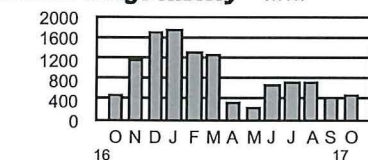
## EMERGENCY SERVICE - 24 HOURS A DAY

Gas leaks, downed lines or power outages

1-888-333-4465, toll-free

OCTOBER STATEMENT GENERATED ON:  
Oct 26 2017

## Electric Usage History - kWh



	Oct 16	Oct 17
kWh used	510	494
Avg regional temp	70	73
Days in billing period	29	29
Cost	\$78.24	\$78.31

For a complete set of tools to analyze your usage, log on to sceg.com.

To view your account online, go to sceg.com and enter the following activation code: XXXXXXXXXX

PLEASE KEEP THIS PORTION FOR YOUR RECORDS.

PLEASE RETURN THIS PORTION WITH YOUR PAYMENT, MAKING SURE THE RETURN ADDRESS SHOWS IN THE ENVELOPE WINDOW.



## Your account is Past Due

PAST DUE AMOUNT	+	CURRENT CHARGES	=	TOTAL AMOUNT DUE
\$168.30 due 11/16/17		\$80.83 due 11/14/17		\$249.13

ACCOUNT NUMBER

XXXXXXXXXX

Please enter amount enclosed.

\$

Write account number on check and make payable to SCE&G.



PO Box 100255  
Columbia, SC 29202-3255

## SEE IMPORTANT NOTICE

Your previous bill amount was not paid in full, and your account is now past due.

## Steps You Should Take

1. Pay the "Past Due Amount" of \$168.30 so that we receive payment by 5:00 PM on 11/16/17.
2. Pay the "Current Charges" of \$80.83 so that we receive payment by 5:00 PM on 11/14/17.

## Risk of Disconnection and/or Credit Action

To avoid further credit action, which may include requiring a deposit and/or disconnection of your service, your "Past Due Amount" and "Current Charges" must be received by the dates shown.

For more details about disconnection, your payment options and your rights, see important notice.

## ACCOUNT SUMMARY

Previous Bill Amount	\$387.17
Payment Received 10/02/17 THANK YOU	-190.03
Payment Received 10/24/17 THANK YOU	-28.84
Current Charges	80.83

**Total Amount Due \$249.13**

A late payment charge of 1.5% may be added to any balance remaining 25 days after billing.

## SUMMARY OF CURRENT CHARGES

Electric Charges	\$78.31
Other Charges & Credits	2.52
<b>Total Current Charges</b>	<b>\$80.83</b>

00001101

00000005408

16 N1

299206098

CLINTON DIXON  
525 ALCOTT DR APT 9F  
COLUMBIA SC 29203-4424





www.sceg.com

### Payment Options

**By Mail:** Pay by check or money order in the enclosed envelope.

**Online:** Visit [sceg.com](http://sceg.com) to pay directly from your bank account or credit card.

**By Phone:** Call 1-800-450-9160, toll-free, 24 hours a day to pay using your credit card, debit card or directly from your bank account. There is a fee of \$3.50 per transaction that BillMatrix receives for providing this service. Additional limitations may apply.

#### Business Office :

FLORA ST CUSTOMER SERVICE OFFICE,  
1213 FLORA ST, COLUMBIA SC 29201

#### Authorized Payment Agencies:

Visit an authorized payment location near you to pay in person. There is no fee associated with service at an authorized payment location.

WINDY MOUNTAIN, 518 BELTLINE BLVD,  
COLUMBIA SC 29205

ALL SC AND NC WALMARTS

#### Unauthorized Payment Agencies:

Additional payment centers may exist in your area that are not SCE&G authorized payment locations. While these unauthorized locations may accept your SCE&G payment, they will charge a fee for doing so, and your payment will be delayed in reaching SCE&G.

CUSTOMER SERVICE

1-800-251-7234

STATEMENT DATE

Oct 26 2017

EXHIBIT B Page 2 of 3

ACCOUNT NUMBER

Page 2 of 3

TOTAL AMOUNT DUE

\$249.13



**View your Past Bills and Usage History Online!** - In addition to giving you the convenience of viewing and paying your current bill online, SCE&G's account services also allow you to view and compare your past bills, usage history and rates for the last two years. It's one more way SCE&G is working to provide you with the highest level of flexibility and convenience available.

To register, simply visit [sceg.com](http://sceg.com) and enter Account Number: [REDACTED] and activation code: [REDACTED]

### CURRENT CHARGES

#### Electric Charges

##### RATE PLAN

008 - Residential Service

##### METER READING

Electric Meter read on 10/24/17 at 08:43 am  
(Next scheduled read date 11/21/17)

METER NO.	BILLING PERIOD	DAYS	CURRENT	PREVIOUS	CONSTANT	KWH
001511521	9/25/17 - 10/24/17	29	92679 -	92185 X	1 =	494
Basic Facilities Charge						10.00
494 kWh X \$ 0.136440						67.40
Renewable Energy Resources						0.91
<b>Total Electric Charges</b>						<b>\$78.31</b>

#### Other Charges & Credits

Late Payment Charge	2.52
<b>Total Other Charges &amp; Credits</b>	<b>\$2.52</b>

**Electronic check conversion.** When you provide a check as payment, you authorize us either to use information from your check to make a one-time electronic fund transfer from your account or to process the payment as a check transaction.



www.sceg.com

CUSTOMER SERVICE

1-800-251-7234

STATEMENT DATE

Oct 26 2017

EXHIBIT B Page 3 of 3

ACCOUNT NUMBER

Page 3 of 3

TOTAL AMOUNT DUE

\$249.13

## IMPORTANT NOTICE

90104

**Past Due Amount** - The previous bill amount was not paid in full, creating a "Past Due Amount" of \$168.30. This amount must be received by 5:00 PM on 11/16/17 to avoid further credit action, which may include requiring a deposit and/or disconnection of your service.

**Current Charges** - The "Current Charges" of \$80.83 must be received by 5:00 PM on 11/14/17 to avoid further credit action which may include requiring a deposit and/or disconnection of your service.

If service is disconnected, the total amount due forelectric and/or natural gas service, a reconnection fee, and a deposit may be required to restore your service.

Please use one or more of the following payment options:

- **ONLINE** at [sceg.com](http://sceg.com) (by credit card or directly from your bank account)
- **BY PHONE** using BillMatrix

To contact BillMatrix, call 1-800-450-9160. (There is a fee of \$3.50 per transaction which BillMatrix receives as the provider of this service.) Payments may also be made by mail or by visiting one of our business offices or payment agencies. For your protection, please do not mail cash or place cash in SCE&G's night deposit boxes.

If this notice does not agree with your records, or if you require assistance with payment options, please contact SCE&G immediately at 1-800-251-7234.

### Before Service is Disconnected

1. You have the right to a personal interview with an SCE&G representative authorized to accept full payment or assist you in making other payment arrangements prior to disconnection. To arrange an interview, call 1-800-251-7234 between 8:00 AM and 5:00 PM Monday through Friday to reach an SCE&G representative at 220 Operation Way, Cayce, SC 29033.
2. Residential service will not be terminated from December 1 to March 31 if the customer, or a member of his household at the premises being served, furnishes SCE&G, no less than 3 days prior to termination or to the terminating crew at the time of termination, a certificate on a form provided by SCE&G and signed by (i) a licensed physician, stating that termination of electric and/or gas service would be especially dangerous to such person's health, and (ii) the customer, stating that he is unable to pay by installments. A certification expires 31 days after execution by the physician and may be renewed for an additional 30 days no more than 3 times.
3. If you are a residential customer enrolled in SCE&G's White Cross Plus+ Program, then service may only be disconnected in accordance with S.C. Code Ann. § 58-5-1110 and/or § 58-27-2510 et seq., as amended.
4. SCE&G works with its customers, including special needs customers, who require help from local agencies.
5. Call 1-800-251-7234 to have SCE&G investigate any dispute you may have concerning your service. The South Carolina Office of Regulatory Staff is available at 1-800-922-1531 to investigate and review any unresolved disputes between you and SCE&G.

**Third Party Notification Program** is a safety net that allows others to be aware of a situation that may affect your energy service, especially during extreme weather conditions. This program gives you the option of naming another person (such as a friend, relative, neighbor, clergy or social agency) to receive a copy of any disconnection notice sent to you. **The third party is not responsible for paying the bill.** Call 1-800-251-7234 to enroll.

